1		
1	Nicholas A. Trutanich United States Attorney	
2	District of Nevada	
3	Nevada Bar Number 13644 Robert A. Knief	
4	Assistant United States Attorney 501 Las Vegas Boulevard South, Suite 1100	
5	Las Vegas, Nevada 89101 Telephone: (702) 388-6336	
6	Email: Robert.Knief@usdoj.gov Counsel for Plaintiff United States	
7	UNITED STATES DISTRICT COURT	
8	DISTRICT OF NEVADA -oOo-	
9	UNITED STATES OF AMERICA,	
	ŕ	Case No.: 2:18-cr-0070-JAD-VCF
10	Plaintiff,	STIPULATION TO RESET
11	VS.	DEADLINE
12	MARIO ARIAS-DIEGUEZ,	(First Request)
13	Defendant.	
14	IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas Trutanich,	
15	United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the	
16	United States of America, and Maggie Lambrose, counsel for defendant Mario Arias Dieguez,	
17	that the deadline for the filing of the government's response to the defendant's Motion to	
18	Compel Confidential Informant Material (ECF No. 51), be reset to February 20, 2020.	
19	This stipulation is entered into for the following reasons:	
20	1. Government Counsel is preparing a response to a motion to suppress and	
21	preparing for trial in two matters scheduled in Reno (3:19-cr-0026-LRH-WGC and 3:19-cr-	
22	0027-LRH-WGC) and needs additional time to research and respond to the instant motion.	
23	2. Government counsel was out of t	he office on February 14, 2020 serving as a juror
24	is a state court matter.	

1	3. Defendant is in custody an	nd does not object to the continuance.	
2	4. For the reasons stated abo	ve, the ends of justice would best be served by a	
3	continuance of the government deadline.		
4	5. Additionally, denial of this	s request for continuance could result in a miscarriage	
5	of justice.		
6	6. This is the first request for a continuance filed herein.		
7	DATED this 18th day of February 2020.		
8		Respectfully submitted,	
9		Nicholas A. Trutanich United States Attorney	
10			
11	<u>/s/ Margaret Lambrose</u> MARGARET LAMBROSE	<u>/s/ Robert Knief</u> ROBERT KNIEF	
12	Counsel for Defendant	Assistant United States Attorney	
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			

1 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 2 -oOo-3 UNITED STATES OF AMERICA. Case No.: 2:18-cr-0070-JAD-VCF 4 Plaintiff, STIPULATION TO RESET 5 **DEADLINE** VS. 6 MARIO ARIAS-DIEGUEZ, (First Request) 7 Defendant. 8 **FINDINGS OF FACT** 9 Based upon the pending Stipulation of counsel, and good cause appearing therefore, the 10 Court finds that: 11 Government Counsel is preparing a response to a motion to suppress and 1. 12 preparing for trial in two matters scheduled in Reno (3:19-cr-0026-LRH-WGC and 3:19-cr-13 0027-LRH-WGC) and needs additional time to research and respond to the instant motion. 14 2. Government counsel was out of the office on February 14, 2020 serving as a juror 15 is a state court matter. 16 3. Defendant is in custody and does not object to the continuance. 17 4. For the reasons stated above, the ends of justice would best be served by a 18 continuance of the government deadline. 19 5. Additionally, denial of this request for continuance could result in a miscarriage 20 of justice. 21 6. This is the first request for a continuance filed herein. 22 23 24

1	<u>ORDER</u>	
2	It is therefore ORDERED that the Government's reply regarding defendant's Motion to	
3	Compel Confidential Informant Material (ECF No. 51), is due on the 20th day of February	
4	2020.	
5	DATED this 19th day of February, 2020.	
6		
7	- Contact	
8	Cam Ferenbach UNITED STATES MAGISTRATE JUDGE	
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		